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10 **UNITED STATES DISTRICT COURT**
11 **FOR THE CENTRAL DISTRICT OF CALIFORNIA**
12 **WESTERN DIVISION**

13 MS. J.P., MS. J.O., AND MS. R.M., on
behalf of themselves and all others
14 similarly situated,

15 Plaintiffs,

16 vs.
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18 WILLIAM P. BARR, et al.,
19 Defendants.
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Case No. 2:18-cv-06081-JAK (SKx)

**DEFENDANTS' NOTICE OF
SUPPLEMENTAL DECLARATION IN
SUPPORT OF DEFENDANTS'
SUPPLEMENTAL RESPONSE TO
THE JOINT STATUS REPORT (ECF
No. 283)**

Hearing Date: None requested
Location: Courtroom 10B
Hon. John A. Kronstadt

**NOTICE OF SUPPLEMENTAL DECLARATION IN SUPPORT OF
DEFENDANTS' SUPPLEMENTAL RESPONSE TO THE JOINT STATUS
REPORT (ECF NO. 283)**

Defendants hereby advise the Court of a supplemental declaration that is to be filed in support of Defendants' Supplemental Response to the Joint Status Report (ECF No. 283). Defendants respectfully request that, if the Court grants Defendants' *ex parte* application for leave to file a supplemental response to the joint status report, the Court consider the attached Declaration of Dr. Ada Rivera, Deputy Assistant Director for Clinical Services/Medical Director of the ICE Health Service Corps (IHSC), as part of Defendants' supplemental response. Specifically, the supplemental declaration will aid the Court in its consideration of Defendants' supplemental responses to sections C, F, and G of the Joint Status Report.

DATED: February 11, 2020

Respectfully submitted,

JOSEPH H. HUNT
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/s/ Lindsay M. Vick
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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION**

Ms. J.P., et al.,

Plaintiffs,

v.

WILLIAM P. BARR, et al.,

Defendants.

Case No. 2:18-cv-06081-JAK-SK

Assigned to the Hon. John A. Kronstadt

DECLARATION OF DR. ADA RIVERA

I, Dr. Ada Rivera make the following statements under oath and subject to the penalty of perjury:

1. I am currently the Deputy Assistant Director for Clinical Services/Medical Director of the ICE Health Service Corps (IHSC) of Enforcement and Removal Operations, U.S. Immigration and Customs Enforcement (ICE). I have held this position since July 2017.
2. In my current position I oversee and monitor all clinical services at IHSC-staffed facilities that house ICE detainees.
3. Nationwide, ICE maintains approximately 150 detention facilities that house adult detainees for over 72 hours.
4. IHSC provides direct medical, dental, and mental health patient care to approximately 13,500 detainees housed at 20 IHSC-staffed facilities throughout the nation.
5. IHSC utilizes a variety of treatment options to treat patients according to their individualized needs, including psychotropic medications, inpatient treatment, and crisis/emergency intervention. Appropriate and necessary levels of behavioral health care are provided based on the patient's diagnosis. This care is administered in general

population, medical housing units, specialized residential behavioral health treatment units, and via community hospitalizations and treatment centers. IHSC behavioral health providers also provide consultative services to address complex and routine behavioral health concerns by serving as subject matter experts for ICE in their respective areas of expertise.


6. IHSC also oversees care for detainees housed at non-IHSC staffed detention facilities across the country through the Field Medical Coordinators (FMC).
7. IHSC additionally oversees the financial authorization and payment for off-site specialty and emergency care services for detainees in ICE custody.
8. IHSC comprises a multidisciplinary workforce that consists of U.S. Public Health Service Commissioned Corps (USPHS) officers, federal civil servants, and contract health professionals.
9. When a non-transient detainee (that is, a detainee who is housed for more than twelve hours) arrives at an IHSC-staffed facility, licensed nurses complete an intake screening of the detainee as soon as possible, but no later than twelve hours after the detainee arrives.
10. The screening consists of a comprehensive medical, dental, and mental health questions.
11. The screening occurs in a designated medical evaluation room. The nursing staff who conduct these screenings are dressed in medical scrubs, civilian clothing, or an appropriate USPHS uniform.
12. As part of intake screening, IHSC inquires about the detainee's language ability. IHSC or a detainee may request a language interpreter. Interpreters are available for various languages and dialects.

13. If the intake screening shows any positive responses, the detainee is referred for a further on-site evaluation to a medical or mental health provider.
14. The screening, and any subsequent treatment, is conducted with the patient only, although a language line facilitator may be involved in this clinical interaction over the phone. An ICE officer is not present in the room during the screening or subsequent treatment session. Communications between the detainee and the mental health provider during medical and mental health screenings and evaluations are generally confidential and are not shared with ICE agents.
15. All IHSC medical professionals are bound by clinical ethical guidelines that govern their respective professions. These ethical guidelines dictate the confidential nature of their interactions with their patients, which include screening, evaluation, and treatment.

I declare, under penalty of perjury under 28 U.S.C. § 1746, that the foregoing is true and correct to the best of my knowledge, information and belief.

DATED: February 11, 2020

Ada Rivera

 Digitally signed by Ada Rivera
Date: 2020.02.11 13:02:05 -05'00'

Dr. Ada Rivera
Deputy Assistant Director for Clinical Services/Medical Director
ICE Health Service Corps
Enforcement and Removal Operations
U.S. Immigration and Customs Enforcement